

# EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LINDA JANN LEWIS, MADISON LEE,  
ELLEN SWEETS, BENNY ALEXANDER,  
GEORGE MORGAN, VOTO LATINO,  
TEXAS STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
and TEXAS ALLIANCE FOR RETIRED  
AMERICANS,

Plaintiffs,

vs.

RUTH HUGHS, in her official capacity as  
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-00577

Related to *Gloria et al. v. Hughs et al.*,  
No. 5:20-cv-00527

**DECLARATION OF GEORGE MORGAN IN SUPPORT OF PLAINTIFFS' MOTION**

Pursuant to 20 U.S.C. § 1746, I, George Morgan, declare as follows:

1. My name is George “Eddie” Morgan. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
2. I live in Dallas, Texas, and am a registered voter in Dallas County. I am 63 years old and a member of the Texas Alliance for Retired Americans (“TARA”). I worked as a geriatric nurse until 1989, when I was instructed by my doctor to terminate my employment for disability reasons, as my contact with patients was threatening my health.
3. I have been politically engaged since elementary school, when my classmate’s father was a candidate for city council and ran his campaign out of my parent’s home. I’ve also been involved in the Stonewall Democrats in Dallas, an LGBTQ Democratic organization, and was member of the year in 2014. For the past several years, I have participated in TARA activities

as a member. Those activities include attending protests, encouraging voter engagement, and registering voters. I am also a precinct chair and voter registrar in Dallas County.

4. Participating in elections is extremely important to me. I have voted in all but one election—local, state, and federal—since I turned 18. I was unable to vote in one election because I was hospitalized unexpectedly and I did not have time or opportunity once hospitalized to get a mail-in ballot.

5. I suffer from a condition called Mounier-Kuhn syndrome, a genetic lung disorder resulting in frequent respiratory tract infections and low lung function. I have had this condition since birth, and have been hospitalized, on average, every other year because of bronchiectasis. My condition requires me to do antibiotic breathing treatments three times a day, use inhalers throughout the day, and receive an IV to give me antibodies for pneumonia every month. I typically receive those IV treatments in the hospital, but because of the COVID-19 pandemic, I am now receiving those treatments at home. During the fall, I suffer from sinusitis that exacerbates the symptoms of my condition.

6. Although I now know that I have been able to vote by mail because of my condition, I have never done so in the past because I did not know I was able to, and because I enjoy voting in person. However, because of my health concerns, I have applied to vote by mail for the July run-off election and the November general election for the first time because I am concerned about the risk of contracting COVID-19, to which I am more susceptible to severe complications. Additionally, unless something drastically changes regarding the pandemic, I will also not be able to volunteer on election day or for early voting because it will not be safe to be around so many people who are standing in line and waiting to vote.

7. Because I suffer from Mounier-Kuhn syndrome, my handwriting abilities fluctuate every day depending on my lung function that day. This is because when I am short of breath, I become shaky and fatigued, which makes my handwriting less legible. I am concerned that my mail-in ballot will be rejected because of signature mismatch under the Signature Match Requirement, despite the fact that I personally signed my application to vote by mail, personally signed the ballot carrier envelope for the July run-off, and will personally sign the ballot carrier envelope in November. If it is rejected, I will have no opportunity to fix the problem and make sure my vote is counted; I would simply be disenfranchised. It is unacceptable to me that mail-in ballots can simply be thrown out without the opportunity to cure, particularly when people like me can only vote by mail because of the public health crisis and so can't avoid the risk of disenfranchisement by voting in person.

8. I am very concerned that with so many more people now relying on the mail system, and not just for mailing ballots, my mail service will be delayed. I am also worried that with Texas's large senior citizen population there will be many people who, like me, have to vote by mail and the county and USPS will not be able to accommodate the influx. This could result in voters receiving their mail-in ballots very close to the election, with insufficient time to mail those ballots back and guarantee that they arrived to the county by the Ballot Receipt Deadline. In my situation specifically, the USPS worker that serves my senior apartment community was not allowed on the premises in March, April, or May, meaning that delivery of my mail was disrupted. While he has been allowed back in because the state has been reopening, I am concerned that there will be disruptions again in the fall when there is likely to be a resurgence of the COVID-19 pandemic.

9. I believe that besides a person's health, there is nothing more important than exercising the right to vote. I do not want to have to make a choice between my health and casting as ballot. I would feel more confident that every ballot will be counted if people have more than one option for returning their mail-in ballot, including having trusted individuals collect those ballots and deliver them directly to the county election's office.

10. Before I received my mail-in ballot for the July run-off, I believed that I would have to pay postage to return that ballot. However, when I received the ballot, I was pleasantly surprised to learn that Dallas County, unlike all other Texas counties that I'm aware of, provides postage prepaid. I am still concerned about others like me—including other TARA members—residing outside of Dallas County, who will have to obtain the necessary postage to mail their ballots in. They will have to independently secure and pay for postage to mail their ballot, but I do not think people should have to spend money to cast their vote.

11. Because of my condition, I have been unable to work for the past 31 years and have lived solely on disability insurance payments and food stamps. Those payments barely cover my necessary expenses to survive. I know for a fact there are many people in the same position in Texas, who are not lucky enough to live in a county that prepays postage, and who will struggle to obtain the necessary postage to return their mail-in ballots because they cannot afford that postage and because they cannot risk their health by leaving their homes to purchase that postage. I also know there are people in West Texas, for example, who are 40 miles from the nearest post office.

12. The laws we are challenging in this case frustrate my hard work in educating voters on voting by mail so that their voices are heard. They also directly threaten my ability to have my vote counted.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 6-16-2020

By: George Morgan  
George Morgan